Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	WC Docket No. 05-196
	)	
E911 Requirements for IP-Enabled Service	)	
Providers	)	
	)	

COMMENTS OF CSDVRS, LLC ON ASSIGNING INTERNET PROTOCOL-BASED TELECOMMUNICATIONS RELAY SERVICE USERS TEN-DIGIT TELEPHONE NUMBERS LINKED TO THE NORTH AMERICAN NUMBERING PLAN

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SUMMARY

CSDVRS provides the following comment on issues raised in the Further Notice of Proposed Rulemaking accompanying the Federal Communication Commission's (FCC or Commission) June 2008 Report creating a uniform numbering system for Internet-based (IP-based) relay users.

9-1-1 Issues. Non-emergency calls should not be preempted for the purpose of handling a 9-1-1 call because this would be a violation of functional equivalency required under the Americans with Disabilities Act (ADA) for relay callers, who expect their calls to be completed to the same extent that voice calls are completed without interruption. There are other ways of ensuring a prompt VRS response to every emergency call, including imposition of a shorter average speed of answer for these calls, and ensuring that all providers, not only the user's default provider, has access to every relay user's location information, so that this information can automatically be convey to emergency authorities by every VRS provider that receives a 9-1-1 call.

Registration Period. The numbering system should provide for a 12 month registration period, as well as a requirement for each VRS provider to submit the number of its new registrations on a quarterly basis to the FCC. Procedures should also be in place to add new registrants after this date has passed.

Eligibility for Multiple Telephone Numbers. In order to ensure functional equivalency, relay users should be able to acquire telephone numbers for their

home, work and other locations, as needed to have functionally equivalent telephone communications.

Use of Toll Free Numbers. VRS providers should be allowed, but not required, to issue toll free numbers to IP-based relay users, free of charge to those users. Because the costs of these numbers is less than the cost for ten-digit geographically appropriate numbers, providers should be permitted to include these costs in their NECA cost submissions.

Signaling. The Commission should assist a migration to SIP-based video equipment in order to ensure that relay users can take advantage of the most advanced communications innovations. Industry-wide standards for the adoption of this protocol need to be developed by an industry standards-setting body, and adopted and enforced by the FCC before implementation of SIP-only based equipment.

Single Number for Multiple Services. Relay providers should be allowed, but not required, to offer a single telephone number to access multiple services, because this is an enhanced telephone feature.

Multi-Line Telephone Systems. Relay providers should confer and cooperate with relay users and institutions that use MLTS to ensure 10-digit numbers to all individuals who must use their facilities. Relay providers should receive a waiver from the rules in this proceeding in cases in where ten-digit numbers may not be permitted by institutions using MLTS. The FCC should work with the Department

of Justice to achieve compliance by such entities where the refusal constitutes a violation of Title II or III of the ADA.

Eligibility to Obtain Internet-Based TRS Telephone Numbers. Hearing individuals who use sign language, along with individuals who have hearing and speech disabilities, should be eligible to obtain telephone numbers from IP-based TRS providers. This will enable point-to-point conversations to take place between hearing and non-hearing individuals, thereby eliminating the need for relay services between these parties and producing cost savings for the NECA TRS Fund.

Security. Providers can assist IP-based relay users in maintaining a high level of security on their computers and network systems without sacrificing an open network that will allow users to receive calls from anyone and use any providers for their inbound and outbound calls. Restricting users to a single default provider would violate principles of interoperability and functional equivalency. Moreover, it is not necessary for the TRS industry to implement standards-based technical solutions for user authentication and for securing the user firewall traversal in order to permit users to continue to enjoy such interoperability. Nor is it feasible to require security features beyond what is currently used on H.323 hardware because these features would require modification (either firmware or hardware) of all devices.

Verification of Registration. Potential VRS users could be verified through point-to-point video calls as part of the registration process. One of the goals of registration should be to develop a system that supports rapid detection of

fraudulent activity and subsequent enforcement actions against the offending entity by appropriate law enforcement agencies. However, the FCC should be careful not to create a policing function over suspected fraudulent activity for IP-based TRS providers.

Slamming. The FCC should exercise its direct or ancillary jurisdiction to apply anti-slamming rules, enforcement procedures, and penalties that are similar to the existing anti-slamming rules in order to protect relay consumers against situations where an IP-based relay provider ports a relay user's number to its relay service without authority or otherwise processes relay calls for that user without that individual's knowledge or explicit authorization. The new rules should clarify that a consumer's default provider is the carrier of record and that the rights of any prior default providers to market to that individual cease as soon as the relay user declares an intent to port his or her number to a new provider. Confirmation of an intent to change one default's provider should be provided in the primary language of the individual requesting the change, and more specifically in sign language for VRS users whose primary language is ASL. IP-based relay users should not be able to "freeze" their default providers.

CPNI – Consumer Privacy. The FCC should exercise its direct or ancillary jurisdiction to apply its CPNI rules, with some modifications, to IP-based relay providers in order to protect the privacy of relay consumers. Definitions in these rules must be narrowly tailored to ensure that customers are only linked with their current default provider for the purposes of CPNI (and the marketing that such

classification as a provider permits). Express (opt-in consent) should be obtained for disclosure to a third party except where customer profiles are transferred to successor state relay providers that are chosen by a certified state TRS program.

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COMMENTS OF CSDVRS, LLC

I. Introduction and Background

CSDVRS, LLC (CSDVRS) submits these comments in response to the Federal Communications Commission's (FCC's) Further Notice of Proposed Rulemaking seeking feedback on how best to assign Internet Protocol (IP)-based telecommunications relay service (TRS) users 10-digit telephone numbers linked to the North American Numbering Plan (NANP).[1] CSDVRS first began providing video relay services (VRS) throughout the United States in January 2007 – initially through other certified or authorized providers – and became FCC certified to bill directly for these services in September 2007. CSDVRS appreciates the FCC's efforts to move quickly to implement uniform numbering for all IP-based relay users. In order to ensure that the transition to the new numbering system is

[1] *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers, Report and Order and Further Notice of Proposed Rulemaking*, CG Dkt. No. 03-123; WC Dkt. No. 05-196, FCC 08-151 (June 24, 2008) (Numbering Report and Order).

efficient, effective, and achieves functional equivalency for all VRS users, CSDVRS offers the following comments.

II. CSDVRS Responses to Issues Raised in the FNPRM

1. 9-1-1 Issues. The FCC raises two important 9-1-1 issues. First, the Commission asks whether communication assistants (CAs) should be directed to terminate a non-emergency call in order to immediately answer a call dealing with an emergency. Second, it seeks comment on technical solutions to enable an alternative relay provider to obtain access to Registered Location information for the purpose of automatically routing emergency calls not made to the user's default provider. Specifically, the Commission asks about Neustar's proposal for "inter-provider signaling," which would require the alternative relay provider to route emergency calls through the 9-1-1 service provider (VPC) used by the caller's default provider.

No Preemption of Non-Emergency Calls

CSDVRS opposes the preemption of non-emergency calls for the purpose of handling a 9-1-1 call because this would be a violation of functional equivalency for the preempted caller. The Americans with Disabilities Act (ADA) promises that TRS calls will be treated in a manner that is functionally equivalent to the way that calls are handled over the voice telephone network. In accordance with this principle, since the start of relay services, relay users have had the justifiable expectation that they may

complete their phone calls without interruption or preemption, to the same extent that hearing callers are able to complete their calls. Nothing in the numbering plan should serve to fail this expectation.

CSDVRS acknowledges that 9-1-1 calls are the result of emergency situations that require prompt attention. However, other mechanisms can be employed to provide the rapid response needed for these calls. For example, the FCC could establish a very short average speed of answer that is specific to 9-1-1 calls handled by VRS providers. At present, the answer speed for VRS remains at two minutes, calculated on a monthly basis. However, most emergencies occur during the evening and nighttime when the fewest video interpreters are on duty and answer speeds are likely to be the longest. A specific speed of answer for emergency calls would induce VRS providers to have adequate staffing to handle most 9-1-1 call scenarios.

A second, and superior alternative would be to ensure that all providers have access to every relay user's location information. Given the growth of VRS and the increasing shortage of sign language interpreters in the United States to handle this growth, undoubtedly, there are going to be occasions when an individual is forced to try a second provider to call 9-1-1 in the evening or the middle of the night, when interpreter staffing is at its lowest. Even with a shortened answer speed, at times the default provider may simply not have an interpreter available to answer a call. It is not a matter of VRS providers not *wanting* to have enough staff for this purpose;

sometimes there just are not enough sign language interpreters to staff all of these calls. This would especially be the case in a large scale emergency or multiple emergencies in a single geographical location. It would also be the case if a provider's network goes down, as discussed below.

The FCC should not create a situation where, if a consumer contacts any provider except the default provider for emergency purposes, the alternative provider called will not have that consumer's physical location information.[2] If this information is not available to the provider, the consumer will be forced to repeat his or her emergency location information manually to the video interpreter, wasting precious time. This outcome would conflict with prior FCC rulings on interoperability, which directed that callers be able to use any provider – and not receive degraded service from that provider – at all times, but especially in emergencies. For example, in its Interoperability Order, the Commission explicitly stated that in an emergency, the inability to reach a second VRS service when the first provider contacted is not able to handle a call because of long wait times could result in "serious harm" to the consumer.[3] The Order went on to explain:

> If a VRS user is restricted to placing a call with one provider, and that provider's wait time prevents the user from promptly reaching a CA in the event of an emergency, the consumer may suffer serious harm. *Even assuming a VRS provider is able to develop a means of promptly handling emergency calls*, this does not negate the broader public interest in ensuring full VRS access to all providers. In the event of an emergency, or an event

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[2] Numbering Report and Order at ¶¶54,86, codified at 47 CFR 64.611(a)(2).
[3] *In the Matter of Telecommunications Relay Services and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities,* Report and Order and Further Notice of Proposed Rulemaking, CG Dkt No. 03-123; FCC 06-57 (May 9, 2006) at ¶36.

> that might temporarily affect a particular provider's ability to offer service, consumers must be able to call any CA to reach emergency services. Particularly in the aftermath of September 11, 2001, and recent hurricanes in the Gulf Coast, *we find that it is essential to ensure that VRS consumers are not dependent on services of a single provider in the event of an emergency*.[4]

The Commission cannot hold true to this statement on the one hand, and on the other expect relay users to rely only on the default provider for the automatic call routing of 9-1-1 calls. In addition to potentially long wait times, VRS users have no fiduciary relationship with their default provider. Unlike subscribers to the PSTN and wireless services, who purchase those services from carriers for a fee and have a justifiable expectation that they will receive a certain level of service, no such relationship exists between a VRS user and his or her chosen default provider. The provider is not bound to the user by contract; indeed, at present, it appears that the provider is not subject to any requirements otherwise imposed on common carriers under Title II of the Communications Act, except for those explicitly implementing Section 225. Without this fiduciary relationship – or coverage under the common carrier rules – there does not appear to be any duty for any provider to continue service. It is providing service at will, and can discontinue that service at any time, for any reason. While it is unlikely that a VRS provider would actually discontinue service intentionally, experience shows that unforeseen circumstances (including financial or technical difficulties) could suspend service, and in fact, has done so for lengthy periods of time – without any FCC consequences. In such cases it is critical for users to be able to continue to make emergency calls, and to have

[4] *Id.* at 36 (emphasis added).

the comfort of knowing that those calls will automatically be routed to an appropriate PSAP to the same extent that voice callers have this guarantee. Only a numbering system that allows every provider to obtain the location information of any relay user and thereby have the ability to automatically route all calls to the appropriate PSAP at any time would provide true functional equivalency.

Inter-Provider Signaling – Complicated and Inefficient

NeuStar has proposed "inter-provider signaling," which would require all VRS providers to be interconnected to each other's 9-1-1 VPC to be able to route any 9-1-1 call received. CSDVRS believes that this proposal is unnecessarily complicated and overly burdensome, given the alternatives that are available. First, the proposal significantly increases the costs associated with providing 9-1-1 services. 9-1-1 VPC providers are likely to charge for each of these connections, along with their usual usage charge to route each 9-1-1 call. Each provider will also have to perform interoperability tests and/or write software to interface to the required set of 9-1-1 VPC providers. Any time any VRS providers changed their 9-1-1 VPC providers, the VRS industry would also be required to certify with the new VPC providers. Because all of these costs are directly related to providing 9-1-1 services, the increased costs would ultimately be borne by the Interstate TRS Fund.

Second, because this proposal requires providers to set up and test mechanisms to ensure the proper routing of calls through the appropriate VPC – when there could be three or more VPC providers – it creates needless hurdles. Under the inter-provider signaling proposal, when a VRS provider receives a call

from a deaf user who is not a "customer" of that provider (i.e., does not use that company as his or her default provider), the VRS provider must have a way of figuring out who the default provider is for that customer, in order to know which 9-1-1 VPC to send the call to for the connection to the right PSAP. However, under the FCC's rules, the numbering database will only have the customer's phone number and IP address. Either information about the providers (and thus, VPCs) that each customer is using must be included in this numbering database, or each non-default VRS provider will have to query each and every 9-1-1 VPC to determine which one can route the call, a time-consuming and potentially costly proposition. The bottom line is that the inter-provider scheme unnecessarily complicates what would otherwise be a straightforward task, were all providers able to tap into a single database that had the location information.

2. **Registration Period.** The FCC seeks comment on the appropriate amount of time for IP relay users to register and provide location information with their default provider. It also asks whether there should be a cut-off date after which individuals would lose the ability to use Internet-based TRS until they register.

CSDVRS recommends a 12 month registration period that can be extended at the discretion of the FCC. CSDVRS also recommends that each VRS provider be required to submit its number of new registrations quarterly to the FCC, so that the progress of the new system can be monitored. After the formal registration period is complete, every time an IP-based relay user

attempts to place a non-emergency call through an IP-based text or VRS provider, the provider should check the user's IP address against the provider's local database. In the event that there is no match, a query should automatically be sent to the central database. If a number is returned from that database, then the call should be processed. If again no match is found, then the caller should be routed to the provider's customer service to resolve the problem. Customer service would then determine the cause of finding "no match" of the IP address (e.g., the IP address may not be current). If it is determined that the caller never registered, he or she would be required to do so to process the call. This will require the central database to support queries from authorized relay providers using the relay user's IP address to determine the associated 10-digit phone number.

3. **Eligibility for Multiple Telephone Numbers.** The FCC seeks comment on whether IP-based TRS users should be able to receive multiple numbers (e.g., for several locations – work and home), and if so, at what cost.

Hearing individuals have telephone numbers associated with telephones used in various facets of their lives – home, work, school, etc. In order to ensure functional equivalency, relay users who are deaf, hard of hearing, and speech disabled should similarly be able to acquire telephone numbers as needed for the telephones that they use in their residences, places of employment, educational institutions, etc.

It is important as well to note that under the FCC's new numbering system, each device will need its own number. This means that if there are four relay users in a household, each of whom has his or her own device, the household will need four different numbers and potentially four different IP addresses, one for each of those devices. If all four individuals subscribe to a single IP service, all four numbers will have to correlate to different IP addresses from the IP service in order to be used simultaneously. Otherwise – i.e., if the four different devices use the same IP address – the devices will not work consistently for both in-bound and out-bound IP-based calls.

4. Use of Toll Free Numbers. The FCC asks whether IP relay users who currently use toll free numbers assigned by relay providers should be charged for those numbers, as are hearing users. The Commission also asks about the impact that the use of these numbers may have on the provision of 9-1-1 service.

CSDVRS recommends that VRS providers be allowed, but not required, to issue toll free numbers to IP-based relay users. Having a toll free number allows relay users, deaf entrepreneurs and small business owners to have functionally equivalent telephone services, thereby fulfilling a major objective of the ADA to promote the full integration of people who are deaf and hard of hearing. Indeed, in its directive for functionally equivalent telephone services, Congress did not distinguish among different types of services; rather, the intent was to provide "functional equivalent dial tone"

service to all telephone users. However, because toll free numbers do not have access to 9-1-1 services, devices assigned only a toll free number will need to carry the same clear disclaimers about their 9-1-1 limitations as are provided for voice telecommunications.

The costs associated with 800 numbers are significantly less than the costs for
10-digit geographical appropriate numbers. VRS providers who choose to provide these numbers should be permitted to include the costs associated with doing so in their NECA cost submissions.

5. **Signaling.** The FCC asks for input on the need to transition to SIP-based user equipment, and what the FCC's role should be in facilitating this process. It also asks what steps it should take to facilitate implementation of standards-based signaling between providers.

Although video relay services currently rely primarily on the H.323 protocol, video manufacturers in the mainstream video market are now building their devices to SIP specifications. In fact, consumers can no longer purchase H.323 video devices in retail stores. SIP technology is an enhanced communication protocol that will offer a number of advantages to video relay users. For example, SIP technology implementation may allow VRS users to have multiple devices in their homes that can all connect to the same telephone number, much like hearing telephone users have voice telephone extensions in their homes. This could allow different devices to concurrently use a single Internet line, provided there is enough bandwidth to

support multiple VRS calls. This would potentially save the TRS Fund the cost of giving out numbers for each and every device in a single household, provided the device remained connected to the LAN and maintained correlation to the IP address that is associated with the 10-digit number.

Next generation 9-1-1 systems to be used by the nation's public safety answering points (PSAPs), which are now under development by the U.S. Department of Transportation and the National Telecommunications Information Administration, are also likely to turn to SIP-based video technologies to receive video calls. CSDVRS encourages a migration to SIP-based video equipment as a means of ensuring that relay users will stay abreast of these and other communications innovations, and to prevent the type of segregation that TRS users experienced over the past few decades as a result of locked-in reliance on Baudot-equipped TTYs.

CSDVRS also recommends that the FCC take advantage of the transition to SIP technology to establish industry-wide standards processes to define the SIP parameters, registration, signaling feature server and interoperability requirements (testing and certification procedures) for VRS providers to strengthen, going forward, the interoperability requirements mandated by the FCC. Finally, CSDVRS proposes that the transition to SIP not be started until these "SIP standards" are defined and approved by an industry forum. Such standards could be developed by a newly created "relay provider committee" of the Alliance for Telecommunications Industry

Solutions (ATIS), and once approved, the standards should be adopted and enforced by the Commission. Until the SIP standards are established, current H.323 interoperability requirements should be actively enforced.

6. Single Number for Multiple Services. The FCC seeks comment on using a single number for multiple communication services, and whether a call forwarding system would accomplish this for IP-based TRS devices. The FCC also queries whether the costs for this functionality should be passed on to relay users.

The ability to have a single NANP number for multiple devices is an advanced feature that is currently made available by PSTN carriers to their customers for an added fee. This feature leverages the call-routing feature offered by the incumbent carrier. The consumer may receive call forwarding as part of a service bundle but is responsible for all additional toll charges associated with the forwarding of the call. Specifically, the feature directs the network to ring a device at a particular number for a specified number of times, and then move to the next telephone number if the first device does not answer. This process is repeated until either the call is answered or all telephone numbers have been exhausted. Under the FCC's new numbering plan, the 10-digit numbers given to consumers could similarly represent different types of TRS service. For example, the primary number could be associated with the video phone and be directed to VRS, the second number could be associated with a text device and be directed to text-based TRS, and so on. The relay provider could then ring the video phone for a specified amount of rings and if there is no answer, attempt to contact the deaf user on his or

her text relay device. This would be a highly sophisticated service for relay providers because it requires changing the service capability (e.g., from VRS to TRS) during the call setup. CSDVRS recommends that relay providers be allowed, but not required, to offer "Single Telephone Number to Multiple Services" functionality, because this is an enhanced, rather than a functionally equivalent, telephone feature.

7. Multi-Line Telephone Systems. The FCC asks what it needs to do to make sure that IP-based TRS users who work in large enterprises, such as colleges and businesses with private branch exchanges and other multi-line telephone systems, have access to functionally equivalent telephone numbers and E911 services required by the Order. It also asks about the impact that these systems would have on the ability of a TRS user to choose a default provider and have emergency calls properly routed.

The current proceeding assumes that relay callers use some type of Internet access to make and receive calls with the hearing population through an interface with the PSTN. In order to make IP-based TRS easily accessible to all people who are deaf, hard of hearing or speech disabled, the person with a disability should be allowed and enabled to obtain a 10-digit number from a relay provider for use in a work or school situation, or to port in a 10-digit number provided by that entity or organization, regardless of the work/school situation or whether the entity uses a multi-line telephone system (MLTS). CSDVRS recommends that IP-based TRS providers review

each MLTS situation with the relay users needing access to these systems and issue 10-digit numbers to such individuals when needed to allow for IP-based TRS.

CSDVRS is aware that there can be situations, especially in corporate or government environments, where the institution's communication systems or practices prevent the relay user from being able to use a 10-digit number to make and receive IP-based relay calls. It has been CSDVRS' experience that once a relay provider engages with the corporate or government entity at issue, often the situation can be resolved. However, the telecommunications systems of college and university situations may present unique issues, due to a potentially high density of relay users needing network resources. Again, relay providers are ready to engage with the appropriate people in these educational facilities to explain what is needed to ensure 10-digit numbers to all students who need them.

In the event, however, that an institution or entity is either unwilling or unable to allow the use of 10-digit numbers, the refusal should be considered a matter of non-compliance by that entity under Titles II or III of the ADA, not a failure of the relay provider.[5] In these instances – when the relay provider lacks the practical means to assign, and the relay user lacks the practical ability to receive, a 10-digit number for IP-based relay calls –

[5] Title II would apply if the facility is operated through a local or state governmental program. Title III would apply if the facility is a private place of public accommodation.

the FCC should be prepared to temporarily waive the requirement that relay providers issue 10-digit numbers to persons in such institutions, and should coordinate with the Department of Justice to enforce the entity's compliance with Title II or III of the ADA to enable assignment of the 10-digit number.

8. Eligibility to Obtain Internet-Based TRS Telephone Numbers. The FCC seeks comment on the eligibility criteria that should be used to get numbers and whether the FCC or industry should facilitate point-to-point calls. The FCC also asks about the probability of number exhaustion.

CSDVRS believes that both individuals who use IP-based relay services and other individuals who can communicate in sign language should be eligible to obtain telephone numbers from Internet-based TRS providers. The latter group will encompass hearing individuals who use ASL to communicate directly with people who are deaf or hard of hearing, including parents, children and other family members and friends of these individuals. It is appropriate for the Commission to facilitate point-to-point calls between such persons and ASL users who are deaf or hard of hearing persons because, under Section 225 of the Act, the Commission has a fiduciary interest in reducing costs to the NECA Fund. If hearing people who sign are unable to obtain telephone numbers, they will have no choice but to continue using relay services to communicate with their deaf contacts, thereby adding unnecessary costs to the Fund.

CSDVRS does not believe that number exhaustion is major problem under the FCC's numbering plan because, even if the distribution of 10-digit numbers has some impact on a specific state or area code, there are excellent mechanisms built into the NANP system to manage and mitigate such shortfalls. Many of these mechanisms already have proven effective to respond to the rapid number consumption by the mobile phone industry.

9. Regulatory Treatment of IP CTS. CSDVRS is not a provider of IP CTS and therefore defers to providers of this relay service to respond to the FCC's inquiries on this subject.

10. Security. The FCC asks several questions related to the need for maintaining the security of the TRS numbering system, equipment, and networks used by IP-based relay providers. Among other things, the Commission seeks input on the extent to which IP-based TRS users should be restricted to a single provider (as NeuStar proposes) and whether default providers should limit their acceptance of calls to those only received from their own Registered IP-based TRS Users, the PSTN, or other IP-based TRS providers. In addition, the FCC asks whether there are standards-based technical solutions for user authentication and for securing the user firewall traversal that would permit users to continue to make or receive relay calls directly through providers other than their default provider.

Security with Open, Not Closed Networks that Permit "Dial Arounds"

CSDVRS believes that the current levels of security in place today for relay users will not be impacted by the implementation of 10-digit numbering. For

several years, relay consumers have used video phones and IP applications, such as IM programs and software-based video clients, that have regularly made use of the Internet and, therefore, have presented many security risks that already have been addressed through Internet-based security programs and procedures. In the past, TRS providers have assisted and will continue assisting these individuals in ensuring that the computers and network systems that they use for IP-based services are secure. For example, CSDVRS provides guidelines to consumers on how best to configure their routers and devices to safely allow them to make and receive relay calls, and to enjoy the benefits of interoperability (both in terms of accessing services of multiple TRS providers as well as using equipment distributed by various TRS providers), without sacrificing the security of these communications.

For the above reasons, CSDVRS does not believe that the new numbering system requires that relay consumers be restricted to a closed network that either limits these individuals only to registered Internet-based TRS users or requires them to use a single provider (their default provider) for all their calls. Denying deaf and hard of hearing individuals who rely on video communications the ability to be contacted directly – via their 10-digit numbers – by other video communication users who are not registered with a TRS provider would segregate these individuals and impede their ability to fully participate in all walks of life.

Similarly, restricting these individuals to a single relay provider would be taking a giant step backwards. Not only would this limit the freedom of choice for

these relay users, but also would violate the FCC's interoperability mandate and have the negative effect of reducing competition in the TRS market. Under a single provider system, if a VRS provider were unable to accept calls – e.g., because none of its video interpreters were available or it could not otherwise meet the needs of a relay caller – the caller would be denied the ability to complete the intended call because there would be no opportunity to dial around to another provider. The only recourse for that consumer would be to port his or her number to another TRS provider, a solution that would not help the consumer at the immediate time he or she wished to complete the rejected call. The need to be able to contact a second or third provider is exacerbated by the FCC's average answer speed of two minutes, which when calculated on a monthly basis, allows providers to have wait times as long as 10-15 minutes several times a month. However, even were the average answer speed reduced, as noted above, there may be other reasons that a caller may need or want to access an alternative provider, including power outages, network failures, or dissatisfaction with the quality of the first provider's interpreting services.

Standards-Based Technology Solutions Not Needed

Nor does CSDVRS believe it is necessary for the TRS industry to implement standards-based technical solutions for user authentication and for securing the user firewall traversal in order to permit users to continue to make and receive relay calls directly through providers other than their default provider. Securing the LAN and computers in the relay user's home or business has always been an

accepted responsibility of the relay user and there are several commonly available techniques for safe computing without having to resort to user authentication and firewall traversal protocols. Additionally, implementing these security measures would increase the costs of TRS services because TRS providers would, in effect, become network security providers for all relay users. Implementing these measures across the relay user base is simply not cost effective or needed.

Requiring security features beyond what is currently being used by relay users on the current hardware base of H.323 video phones is also not feasible, given the way that H.323 is currently implemented and its hardware platforms are deployed, because the addition of such features would require modification (either firmware or hardware) of all devices. However, if there is a compelling need for increased security that cannot be addressed by the relay user, then security procedures can and should be built into requirements to be developed for SIP relay applications. This will afford TRS providers an opportunity to design these requirements into the end user device (software and/or hardware) and each TRS provider's network. If, however, the FCC does move forward to impose any such security requirements, it must also address the issue of liability for damages caused by breaches of such security occurring on relay user networks and/or relay user computer platforms.

11. **Verification of Registration.** The FCC asks whether a closed system requiring providers to validate the registration of users before completing non-emergency calls would help curb IP relay fraud, and whether it can do so without

imposing undue burdens on legitimate IP-based TRS users. It further asks how providers can verify registration, and whether IP-based TRS providers should filter out requests for TRS that come from suspected illegitimate users.

CSDVRS believes that one of the goals of registration should be to develop a system that supports rapid detection of fraudulent activity and subsequent enforcement actions against the offending entity by appropriate law enforcement agencies. Having IP-based TRS providers provide a policing function over suspected fraudulent activity is untenable from both a business and liability prospective for TRS providers. Rather, current laws that allow enforcement actions should be leveraged and a registration system devised to provide the information necessary to support fraud detection and subsequent law enforcement actions.

CSDVRS recommends that individuals seeking to use relay services be required to positively identify themselves to the TRS provider during the registration process to receive a 10-digit number. One method of achieving this for VRS users would be to use a point-to-point video call as part of the registration process. For example, the TRS provider could verify the identity of the relay user by having the individual hold valid state or federally issued identification papers that include a picture of the individual up to the video camera. Once the relay user has a 10-digit number, verification will occur on a per call basis because the 10-digit number and IP address can be checked against each other at call setup. If there are problems, the call can be routed to customer service for verification.

12. Slamming Issues. The FCC asks a number of questions about the need for and content of anti-slamming rules to protect consumers against unauthorized provider changes, given the substantial competition among VRS and IP relay providers.

CSDVRS does believe that VRS providers should be subject to anti-slamming rules and penalties that are similar to those that apply to common carriers in order to protect relay consumers against unauthorized default provider changes. As the Commission notes, slamming rewards unfair deceptive and fraudulent practices and hurts the ability of consumers to select their providers of choice. In the context of TRS, slamming would occur when an IP-based relay provider ported a relay user's number to its relay service or otherwise processed relay calls for that user without that individual's knowledge or explicit authorization. Competition among IP-based relay providers has already been significant; with new rules requiring each relay user to select a default provider, this competition will probably intensify, making slamming all the more likely.

FCC Authority

The FCC clearly has jurisdiction to apply slamming rules in the relay context. First, because section 225 is contained within Title II, and because telecommunications relay services were originally intended by Congress to be an accessible substitute for PSTN-based telephone (telecommunications) services, there is little question that the FCC has direct authority to apply the slamming rules to TRS providers. However, even if the FCC questions its direct authority, it

meets the prerequisites to employ ancillary jurisdiction under Title I of the Act to apply these rules. First, as the Commission notes, it has subject matter jurisdiction over relay services under Section 225 of the Act. Second, there is no question that the application of the slamming rules is necessary – and therefore "reasonably ancillary" – to the Commission's overall obligation to ensure efficient and effective relay services. As the Commission suggests, extending these Title II obligations to relay providers is consistent with other actions that the Commission has taken under the ancillary jurisdiction doctrine, including application of the TRS mandates to interconnected VoIP providers pursuant to section 225(b) of the Act.

Obtaining Consumer Authorization

Confirmation requirements in anti-slamming rules that apply to VRS providers should be slightly modified from the common carrier rules to address the unique nature of this service. Specifically, we recommend that confirmation for changes in a VRS user's default provider be obtained from the user by both (1) the user's written or electronic signature authorizing the change, *and* (2) a declaration by the user confirming the intent to switch to a new provider that is captured in an Internet-based video communication session between the new provider and with the consumer – either directly (in a point-to-point conversation) or via VRS. There are significant language differences between English and ASL that could make a signature alone (written or electronic) suspect in certain cases. Because the concept of slamming – or the unauthorized switching of providers – will be entirely new in the context of VRS to members of the deaf community, it is critical to make sure

that each individual confirming the intent to switch fully understands and truly intends to make that switch. The only way that this can be achieved effectively is through communication in that individual's primary language, which is likely to be ASL if the individual uses sign language. In addition, the new VRS provider should be required to record the video session with that individual as a confirmation record and maintain that record for a period of two years. This record should confirm that the relay subscriber understood that he or she was requesting a provider change, along with the date, time, name, and address of the person providing the authorization and the name and company conducting the confirmation. The record should also include the IP text relay or VRS telephone number to be switched and verify the type of relay service that will be affected. These various measures will be especially important if the FCC does not utilize third party verification for these default provider changes, as is proposed in its Further Notice. Stated otherwise, if the safety net of third party verification – which has proven highly effective in the PSTN context – is not available in the VRS context, at minimum, individuals should be required to provide confirmation in their own language.[6]

Finally, the FCC asks whether it should adopt procedures by which a TRS user can "freeze" his or her default VRS or IP relay provider, which would prevent a change in providers unless the consumer gave the provider from whom the freeze

[6] CSDVRS notes that Sorenson has proposed third party verification in its ex parte submission of May 15, 2008 at Attachment 3, page 3. While we do not propose such verification in these comments, if such verification is required, we agree with Sorenson that the communication with such third party should be in the language to which the TRS user is most accustomed and that the third party verifier should be prohibited from marketing a provider's services.

was requested his or her express consent. CSDVRS recommends that this option not be offered to IP-based relay users, given the highly competitive nature of this business and the aggressive marketing practices that have occurred in the past.

Substance of Anti-Slamming Rules

CSDVRS recommends that the FCC's anti-slamming rules for IP-enabled TRS substantially track the existing anti-slamming rules implementing section 258 of the Act. These new regulations, however, should contain specific language clarifying that only a consumer's default provider is the carrier of record and further specify that the right of any prior default providers to market to that individual shall cease as soon as the relay user declares an intent to port his or her number to a new provider. This will prevent undue pressure on the relay user during the porting process.

Liability Provisions

CSDVRS recommends the following enforcement structure when slamming of an IP-based TRS user occurs:

If the TRS provider *has not* yet submitted the monthly minutes to the TRS Fund Administrator containing the slammed user minutes,

(1) the TRS provider should be required to remove all slammed user minutes from its monthly submission to the TRS Fund Administrator, and forfeit all revenue from the slammed user minutes, to be remitted to the TRS Fund;

(2) the TRS provider should be fined an amount equal to 50% of the previous month's billing, for the slammed user minutes, to be remitted to the TRS Fund; and

(3) the FCC should impose a forfeiture penalty of $40,000 per slamming occurrence.[7]

If the TRS provider *has* submitted the monthly minutes to the TRS Fund Administrator containing the slammed user minutes and has already been compensated for those minutes,

(1) the TRS provider should be required to remove all minutes from all months containing the slammed user minutes and forfeit all revenue from the slammed user minutes, to be remitted to the TRS Fund;

(2) the TRS provider should be fined an amount equal to 50% of all previous billings, in aggregate, containing the slammed user minutes, to be remitted to the TRS Fund;

(3) the FCC should impose a forfeiture penalty of $40,000 per slamming occurrence; and

(4) the TRS Fund Administrator should forward to the authorized provider an amount equal to 100% of all payments that the unauthorized provider received from the Fund for minutes attributable to the slammed user.[8]

The above fines and penalties, requiring the unauthorized carrier to repay the authorized provider and TRS Fund a total of 150% of the payments associated with the slammed user minutes after the unauthorized charges are submitted, should dissuade VRS providers and others from engaging in slamming and provide significant incentives for TRS providers to implement strictly the Commission's verification rules. The reimbursable minute charge used to calculate these amounts should be the highest per minute charge on the appropriate reimbursement

[7] We agree with the FCC that a provider should not be permitted to build such forfeiture amounts into cost data submitted to calculate TRS rates for subsequent years.

[8] The rationale for this is that the TRS Fund Administrator is the agency that receives and disburses funds for TRS minutes submitted and is in the best position to forward the appropriate funds to the authorized provider.

schedule for the TRS service.

In addition, the FCC asks whether the Commission and the TRS Fund Administrator have sufficient safeguards in place to ensure that unauthorized minutes are actually excluded from the unauthorized provider's monthly submissions. To achieve this, CSDVRS recommends that the call detail records submitted to the TRS Fund Administrator be modified to include relay user phone numbers. This adjustment will allow the TRS Fund Administrator to determine whether the monthly billings submitted by each TRS provider contain minutes from calls made by slammed users.

Complaint Resolution

CSDVRS recommends the following modified set of procedures for dealing with unauthorized provider changes of a TRS user: Providers who are informed of an unauthorized change of a relay user should immediately notify both the slammed user and the provider that had been authorized to provide service to that user (i.e., the user's default provider) of the unauthorized switch in providers, as well as their right to file a complaint with the FCC within 30 days after receiving such notification. In the event that the relay user finds out by some other means that he or she has been slammed, the user should notify the alleged unauthorized provider of such fact within 30 days of learning of the unauthorized use of his or her minutes. Once a slamming complaint is filed with the FCC and a provider is given notification by the Commission of a possible slamming violation, the allegedly unauthorized carrier should be given 5 working days to rebut the allegation of the

unauthorized carrier change. If that provider is an IP text relay provider, it should be compelled to produce a hard copy of the signed authorization to change providers. If that provider is a VRS provider, it should be compelled to produce *both* a hardcopy of the signed authorization *and* the video of the relay user confirming the requested provider change.

CSDVRS agrees with the FCC's tentative decision to exclude an option for states to resolve VRS and IP Relay slamming complaints or otherwise administer the slamming rules because as noted by the Commission, states do not have oversight authority for IP relay and VRS. CSDVRS also believes that the FCC should allow a VRS or IP Relay provider to acquire, by sale or transfer, either part or all of another provider's consumer base, provided that the acquiring provider complies with specific procedures.

13. CPNI – Consumer Privacy. The FCC asks for input on a number of issues related to the need for FCC actions to ensure the privacy and security of IP-based TRS users' personal information, including Registered Location information.

Under Section 222 of the Communications Act and the FCC's implementing regulations, a wireline, wireless and interconnected VoIP carriers are permitted to use a customer's CPNI under restrcited conditions.[9] CSDVRS believes that these

[9] The most recent modifications to these rules occurred in April 2007, when the FCC extended their application to interconnected VoIP providers. *In the Matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, IP-Enabled Services*, Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. No. 96-115, WC 04-36, FCC 07-22 (April 7, 2007) (CPNI Order).

rules should apply as well to all TRS providers, including traditional (PSTN-based) TRS providers. By directing IP-based relay users to choose a default provider, and to make and receive most calls through that provider, the new numbering system treats these users very much like voice telephone subscribers. As such, these individuals should have the same right to privacy of their customer information that subscribers of voice telephone services have. However, because there are certain differences between individuals who use voice telephone services over the PSTN or VoIP, and IP-based relay services, CSDVRS offers the following guidance to the FCC for application of the CPNI rules to IP-based TRS. We also comment on several of the suggested changes to the CPNI rules made in Sorenson's ex parte on this issue.[10]

Provider Applicability

In its ex parte, Sorenson proposes to include "TRS and point-to-point service" within the types of services provided by a carrier who is subject to the CPNI rules. CSDVRS agrees that providers of both types of services should be required to protect customer information under the CPNI rules, but we reject Sorenson's proposed definition for point-to-point (video) service as being too broad. Specifically, Sorenson suggests that point-to-point be defined as:

> "a video service that *facilitates* the transmission of non-relay calls in which a video end user device . . connects to another such device via a ten digit NANP number that has been assigned to the called device, allowing deaf, hard of hearing, speech disabled and other individuals to communicate directly in real time via sign language without the assistance of an interpreter."[11]

[10] Sorenson Ex Parte Notice (May 15, 2008).
[11] *Id.* at Attachment 1, page 2 (emphasis added).

The problem is that, when inserted into the CPNI regulations, this definition could potentially allow any video provider that provides routing information for a call or otherwise assists in the completion of such call to claim that it has *facilitated* that call, and is therefore entitled to use that caller's CPNI. If applied to the PSTN environment, such a definition would make virtually every subscriber a customer of every carrier that assisted in the interconnection of the call.

Sorenson' proposed definition of "customer" suffers from the same flaw. The FCC's CPNI rules define a "customer of a telecommunications carrier" as "a person or entity to which the telecommunications carrier is currently providing service." Sorenson has suggested that a TRS customer be defined as "someone to which a provider is currently providing service or who has received a 10 digit number."[12] Again, multiple providers could use this definition to claim the same customer as their own. This is because a user may acquire a video device and number from one provider, and then port that number to a second provider, making the second provider his or her default provider. In this instance, under Sorenson's proposed definition, both the first and the second provider would have access to the customer's CPNI. However, more than likely, the consumer would not consider him or herself to be a "customer" of the first provider once the number has been ported. Rather, that relay user would have a legitimate expectation that he or she now only had some type of relationship with the new default provider.

[12] *Id.* at Attachment 1, page 1.

Sorenson's definition also would seem to allow a provider that processed a dial around call from a user to declare that it had "provided service" for that call. Similarly, under this definition, a provider could declare that any relay user that called the relay user's device is a customer because the device facilitated the call and provided service. In none of these scenarios, however, are the providers actually "providing service" to a customer in the intended sense of this definition. Nor should the mere provision of routing information needed to complete a call (such as the provision of information about a caller's geographical location to complete an emergency call), be counted as the "provision of service," and relevant for the purposes of accessing or using the consumer's CPNI.

There is a good reason to carefully define the category of callers that any one provider can claim as its customers. Under the CPNI rules, a carrier is permitted to market service offerings to its customers so long as those offerings are among the categories of service to which the customer already subscribes from that carrier. The extent to which providers should be allowed to market for this purpose remains at issue, but regardless of the outcome of that debate, CSDVRS fears that an overbroad definition, such as the one proposed by Sorenson, might cause a customer to be marketed by multiple providers for certain purposes.

It would be far preferable to have a narrowly tailored definition that links the customer with his or her current default provider,[13] a practice that is consistent

[13] In the case of state-based TRS programs, this would be the relay provider selected by the certified state. In the case of IP-based relay services, this would be the relay

with the current practice for voice telephone users. The sole factor that should be used to determine whether a relay user is a customer is whether the user has declared the TRS provider to be his or her the "default provider" and whether that provider is responsible for keeping the IP address for that relay user's 10-digit number updated in the central database. This is analogous to the PSTN where the customer has contracted for service and the carrier is responsible for the routing of calls made from that customer's phone number.

FCC Authority

The FCC asks whether it has sufficient authority under section 225 to apply the CPNI rules to consumers who use TRS or point-to-point video services. As noted above, because section 225 is already contained within Title II, and Congress intended for TRS to be a substitute for telephone services, the FCC has direct authority to apply the CPNI rules to TRS providers. CSDVRS also believes that the FCC has authority under Section 225 to regulate the provision of point-to-point video services where doing so will impact the TRS fund. However, to the extent that the FCC may deem the nexus between CPNI and expenditures charged to the TRS Fund too tenuous to justify this authority, the FCC can certainly find sufficient ancillary jurisdiction to extend the CPNI rules to these point-to-point calls, as well as to calls made through TRS.

In order to invoke ancillary jurisdiction over communication services, two events must occur. First, the services must fall within the FCC's subject matter

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user's current default provider, even if this is not the same provider that originally gave the relay user his or her 10-digit number.

jurisdiction and second, jurisdiction over these services must be reasonably ancillary to the effective performance of the FCC's responsibilities. In the case at hand, there is no question that TRS falls within the subject matter jurisdiction granted to the FCC by Section 225 of the Communications Act; nor is there any question that the FCC has Title I jurisdiction to regulate point-to-point communications that take place over the Internet if it so chooses. Additionally, as shown below, the agency's jurisdiction over both TRS and point-to-point calls is needed for the FCC to fulfill its responsibilities to protect the privacy of both video and voice callers.

When the FCC determined that it had sufficient authority to apply its CPNI rules to interconnected VoIP providers, the FCC explained that, from the perspective of the caller, making a wireline, wireless or VoIP call are indistinguishable. Similarly, VRS and point-to-point video users rely on video communications as their primary, and often sole mode of communication. For these individuals, the video device is their telephone, and the provider that handles calls made from that device is perceived as the individual's telephone company.[14] Thus, there is the same expectation that this provider will protect the privacy of calls made by deaf, hard of hearing, and speech disabled callers – via relay services or

[14] To this end, CSDRVS agrees with Sorenson's proposal to add a new definition for "telephone" to the CPNI rules. As proposed by Sorenson, this definition would encompass not only traditional voice telephone devices, but in the case of deaf, hard-of-hearing, or speech-disabled persons, an analogous device (including videophone, text telephone or personal computer) to place or receive a TRS or point-to-point call. Sorenson Ex Parte at Attachment 1, page 3, proposing an amendment to 47 C.F.R. §64.2003(t).

point-to-point video – as these callers always have had when making calls over the PSTN with their TTYs. Because it is reasonable for deaf, hard of hearing, and speech disabled consumers to expect that their calls will be private, irrespective of the way that these calls are made, it is appropriate for the FCC to extend the CPNI rules to both of these calling services.[15]

In its April 2007 Order, the Commission also found that extending the CPNI safeguards to interconnected VoIP services was necessary to protect the privacy of wireline and wireless customers who make and receive calls to VoIP customers. More specifically, the FCC explained that Section I of the Act directs the Commission to ensure that the nation's wire and radio communication service promotes the safety of life and property. It said that it would not be fulfilling this responsibility if it failed to protect a consumer's private information, and concluded that if its CPNI rules did not cover interconnected VoIP customers, "a significant number of American consumers might suffer a loss of privacy and/or safety resulting from the unauthorized disclosure of their CPNI – and be harmed by this loss."[16]

Like interconnected VoIP, one of the parties to a VRS call is someone using a wireline, wireless or interconnected phone service. For the same reasons that the

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[15] The FCC similarly used this reasoning to apply the CPNI rules to interconnected VoIP services: "It therefore seems reasonable for American consumers to expect that their telephone calls are private irrespective of whether the call is made using the services of a wireline carrier, a wireless carrier, or an interconnected VoIP provider, given that these services, from the perspective of a customer making an ordinary telephone call, are virtually indistinguishable." CPNI Order at ¶56.

[16] *Id.* at ¶58.

FCC decided to extend the CPNI obligations to interconnected VoIP users, these rules need to be extended to VRS users, to ensure that the privacy of all parties to VRS calls is maintained.

Disclosure to a Third Party. In response to the FCC's inquiry as to whether consumers should have to give express consent before a provider may disclose customer records to a third party, CSDVRS believes that express (opt-in consent) should be obtained for this purpose, with one exception. Specifically, the application of the CPNI rules to traditional, PSTN-based providers should not eliminate the obligation (created by the FCC in its 2000 Report and Order), to transfer customer profiles to new state relay providers when these are chosen by a certified state TRS program. The FCC has already determined that the transfer of such information is needed to ensure the seamless provision of state relay services to consumers, who would otherwise have to go through the chore of providing this information every time a state changed relay providers. At the time that the FCC created this obligation, it explained,

> If a new vendor cannot receive the caller profile information from the old vendor, however, customers experience significant disruption of service. Callers must rebuild the profile with the new vendor, and risk billing and other problems. In addition, the new vendor must spend time and resources to obtain the customer profile information from the TRS users.[17]. . . . We conclude that transferring this data is essential to fulfilling our statutory mandate to ensure that TRS is available "in the most efficient manner." The transfer of TRS user profile information between TRS providers does not violate TRS user privacy expectations, because the user has agreed to give the data to the TRS provider.

[17] *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. 98-67 (March 6, 2000) (2000 Report and Order) at ¶78.

> In addition, the reason for giving this data to the TRS provider remains even if there is a change in TRS providers.[18]

So long as the new provider is designated by the state to be the relay successor, transferring information to that entity would continue to protect the consumer's information and should be permitted even under new rules that apply CPNI to TRS. However, we agree with the FCC's warning back in 2000, that such data should "not be used for any purpose other than the provision of TRS.[19] By contrast, in order to maintain the privacy of IP-based customers, CSDVRS believes that IP-based TRS providers should have to remove all personally identifiable consumer information associated with IP-based TRS users when these individuals select and transfer to a different default provider.

Opt-in Procedures

The FCC's CPNI rules require carriers to notify customers of their right to restrict the use of their CPNI under certain circumstances. Where sign language users of video communication are contacted for the purpose of receiving notification, giving opt-in approval, or expressing an intent to opt-out, these communications should be provided in sign language, using a qualified video interpreter. This notification and/or authorization should be kept on videotape for a minimum of one year. In addition, any notification given should be standardized and defined by the FCC to take the guesswork out of whether a particular notification is appropriate.

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[18] *Id.* at ¶82.
[19] *Id.* at ¶83.

Use for Emergency Purposes. CSDVRS agrees with Sorenson that CPNI should be available to providers for the purpose of responding to and handling 9-1-1 calls, accessing a database for the purpose of determining the appropriate PSAP or other local emergency authority for the user's location, relaying the emergency call to that authority, and facilitating the dispatch and response of emergency service personnel to that location.[20]

CSDVRS Privacy Measures

The FCC has asked providers to describe systems they now have to safeguard personally identifiable information of TRS users, and to indicate the degree to which those systems have succeeded in protecting consumers from the unauthorized disclosure of personally identifiable customer data. CSDVRS has a multi-tiered access methodology to maintain the privacy of personally identifiable customer data. This consists of:

- The Customer Database
    - Access to customer data from the website is protected with a login ID and password. The customer can access only their personal data and have no search capability on this database.
    - Customer service can access a specific customer record only while working with that customer.
- Customer Billing Records
    - Access to customer billing records is limited to people with a need to acquire this information. The billing database is segmented from the back office systems and under additional access control.

CSDVRS is confident that this system has successfully safeguarded

[20] Sorenson Ex Parte Notice at 4-5, proposing an amendment to 47 C.F.R. §64.2005(c)(4).

consumers from the unauthorized disclosure of their personally identifiable customer data.

III. Conclusion

CSDVRS wishes to thank the Commission for the opportunity to provide input on the various numbering issues raised in its FNPRM. We stand ready to meet the FCC's deadline of December 31, 2008 for the implementation of uniform numbers for VRS users.

Respectfully submitted,

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